



**GENOVA  
BURNS**  
ATTORNEYS-AT-LAW

30 Montgomery Street, 11th Floor, Jersey City, NJ 07302

**Tel:** 201.469.0100 **Fax:** 201.332.1303

**Web:** www.genovaburns.com

Lawrence Bluestone, Esq.  
Counsel  
Member: NY, NJ and PA Bar  
[lbluestone@genovaburns.com](mailto:lbluestone@genovaburns.com)  
Direct: (973) 535-4434

January 26, 2021

**BY ECF**

Hon. William T. Walsh, Clerk of Court  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Ameream Management, LLC. v. I.U.O.E., Local 825, et al.**  
**Civil Action Number: 2:20-cv-20345 (MCA) (LDW)**

---

Dear Mr. Walsh:

We represent Plaintiff Ameream Management, LLC ("Ameream"). Defendant Bergen County Building and Construction Trades Council, AFL-CIO ("BCTC") filed a Motion to Dismiss Part of the Complaint (ECF No. 10), which is currently returnable on February 16, 2021.

We write to request an automatic extension pursuant to Local Civil Rule 7.1(d)(5). Pursuant to Local Civil Rule 7.1(d)(5), the return date of BCTC's motion is adjourned to March 1, 2021 (with opposition papers due February 16, 2021; and reply papers due February 22, 2021). To date, there have been no extensions or adjournments requested regarding the response date to this motion. Thank you for your time and consideration in this matter.

Respectfully,

**GENOVA BURNS LLC**

LAWRENCE BLUESTONE

LB:tc

c: Raymond Heineman, Jr., Esq. (via ECF)  
Alexander Hemsley, III, Esq. (via ECF)  
Vincent Giblin, Esq. (via ECF)  
Angelo J. Genova, Esq. (via ECF)  
Donovan Wickline, Esq. (via Email)

15781530v2 (2960.012)